STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
John H. Tippets, Director

January 3, 2019

Mark Elder, Division Manager
Sunroc dba Clements Concrete - Joplin Pit
10340 Highway 20
Caldwell, Idaho 83605

RE: Facility ID No. 001-00184, Sunroc dba Clements Concrete - Joplin Pit, Boise
Final Permit Letter

Dear Mr. Elder:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2018.0038 Project 62106 to Sunroc dba Clements Concrete - Joplin Pit located in Boise. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received August 27, 2018.

This permit is effective immediately and replaces Tier II Operating Permit No. T2-2008.0059, issued on March 30, 2011. This permit does not release Sunroc dba Clements Concrete - Joplin Pit from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Tom Krinke, Air Quality Compliance Officer, at (208) 373-0550 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Morrie Lewis at (208) 373-0502 or Morrie.Lewis@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\ML
Permit No. P-2018.0038 Project 62106
Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee	Sunroc dba Clements Concrete Company – Joplin Pit
Permit Number	P-2018.0038
Project ID	62106
Facility ID	001-00184
Facility Location	10988 Joplin Road Boise, ID

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued January 3, 2019

Morrie Lewis, Permit Writer

Mike Simon, Stationary Source Manager

Contents

1 Permit Scope

Purpose

1.1 This is an initial permit to construct (PTC) to convert a Tier II operating permit to a PTC.

1.2 This PTC replaces Tier II Operating Permit No. T2-2008.0059, issued on March 30, 2011.

Regulated Sources

1.3 Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Sections	Equipment ID	Source	Control Equipment
2–5	76-4036	Primary and Secondary Crushers Manufacturer/model: Eljay RC54 Standard Roller Cone Serial number: 23J0889 Capacity: 450 tons per hour (T/hr) [a] Manufacture date: 1983	Proper O&M, reasonable controls such as water sprays, and BMP
	76-4027 [b]	Manufacturer/model: Cedar Rapids Jaw Serial number: 33832 Capacity: 450 T/hr [a] Reconstruction date: 1996 [b] Manufacture date: 1980	
2–5	77-4039	Primary and Secondary Screens Manufacturer/model: Eljay 5'x16' Triple Deck Serial number: 3YFO87M Capacity: 350 T/hr [a] Manufacture date: 1983	Proper O&M, reasonable controls such as water sprays, and BMP
	77-4024 [b]	Manufacturer/model: JCI 7' x 20' Triple Deck Serial number: S051611 Capacity: 500 T/hr [a] Manufacture date: 2006 [b]	
	77-4034 [b]	Manufacturer/model: JCI 6' x 20' Triple Deck Serial number: 00LP17B32 Capacity: 400 T/hr [a] Manufacture date: 2003 [b]	

Table 1.1 Regulated Sources

Permit Sections	Equipment ID	Source	Control Equipment
2–5		Conveyor Transfer Points Manufacturer/model: Good Fellow Capacity: 300 T/hr [a] Manufacture date: 2016 [b]	Proper O&M, reasonable controls such as water sprays, and BMP
		Manufacturer/model: Good Fellow Capacity: 300 T/hr [a] Manufacture date: 2016 [b]	
		Manufacturer/model: Good Fellow Capacity: 300 T/hr [a] Manufacture date: 1982	
		Manufacturer/model: Morberg Capacity: 300 T/hr [a] Manufacture date: 1983	
		Manufacturer/model: (manufactured by permittee) Capacity: 375 T/hr [a] Manufacture date: 1982	
		Manufacturer/model: (manufactured by permittee) Capacity: 375 T/hr [a] Manufacture date: 1982	
		Manufacturer/model: (manufactured by permittee) Capacity: 375 T/hr [a] Manufacture date: 1982	
		Manufacturer/model: (manufactured by permittee) Capacity: 375 T/hr [a] Manufacture date: 1982	
		Manufacturer/model: (manufactured by permittee) Capacity: 375 T/hr [a] Manufacture date: 1982	
2, 5		Diesel fuel storage tanks 1 x 5,00 gallon, 1 x 5,000 gallon, 1 x 7,500 gallon	Reasonable controls
2–5		Truck loading Vehicle traffic (paved and unpaved roads) Stockpiles (active and inactive)	Proper O&M, reasonable controls, and BMP

a) Tons per hour rated capacity (T/hr). The total combined capacity of the plant is limited by this permit (Permit Condition 3.6).
b) NSPS Subpart OOO affected facility as defined in 40 CFR 60.670 and 671. Equipment was identified as constructed, reconstructed, or modified after the effective date of August 31, 1983. Reconstructed equipment includes the Cedar Rapids Jaw, and replacement equipment includes the JCI screens and two Good Fellow conveyors.

2 Facility-Wide Conditions

Emission Limits

2.1 Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dust.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

2.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

2.5 Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

2.7 Visible Emissions

The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with these requirements.

2.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

2.9 Open Burning

The permittee shall comply with the requirements of the Rules for Control of Open Burning, IDAPA 58.01.01.600-623.

Reports and Certifications

2.10 Any reporting required by this permit, including but not limited to records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706-2239

Phone: (208) 373-0550
Fax: (208) 373-0287

2.11 Sulfur Content

No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil - 0.3% by weight.
- ASTM Grade 2 fuel oil - 0.5% by weight.

2.12 The permittee shall maintain documentation of supplier verification of distillate fuel oil content on an as-received basis.

3 Sand and Gravel Plant

3.1 Process Description

This facility conducts gravel mining, crushing, and screening operations. Electricity is supplied by the local utility.

3.2 Control Equipment Descriptions

The permittee uses proper operation and maintenance of equipment (Permit Conditions 3.5 and 5.2), reasonable controls (Permit Conditions 2.1 and 3.7), and best management practices (Permit Condition 3.8) to control emissions from operations.

Emission Limits

3.3 Emission Limits

In accordance with the State Implementation Plan, 40 CFR 52.670(d), EPA-approved State Source-specific Requirements:

- PM_{10} emissions from the sand and gravel transfers, crushers, screens, vehicle traffic, and wind erosion of stockpiles shall not exceed 12.32 lb/hr.
- PM_{10} emissions from the sand and gravel transfers, crushers, screens, vehicle traffic, and wind erosion of stockpiles shall not exceed 18.5 tons per any consecutive 12-calendar month period.

3.4 Visible Emission Limit

In accordance with the State Implementation Plan, 40 CFR 52.670(d), EPA-approved state source-specific requirements, visible emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period. Visible emissions shall be determined by EPA Reference Method 22 (as described in 40 CFR 60 and presented below) or a DEQ-approved alternative method.

Method 22-Visual Determination of Fugitive Emissions From Material Sources and Smoke Emissions From Flares

This method is not inclusive with respect to observer certification. Some material is incorporated by reference from Method 9.

1.0 Scope and Application

This method is applicable for the determination of the frequency of fugitive emissions from stationary sources. This method also is applicable for the determination of the frequency of visible smoke emissions from flares.

2.0 Summary of Method

2.1 Fugitive emissions produced during material processing, handling, and transfer operations or smoke emissions from flares are visually determined by an observer without the aid of instruments.

2.2 This method is used also to determine visible smoke emissions from flares used for combustion of waste process materials.

2.3 This method determines the amount of time that visible emissions occur during the observation period (i.e., the accumulated emission time). This method does not require that the opacity of emissions be determined. Since this procedure requires only the determination of whether visible emissions occur and does not require the

determination of opacity levels, observer certification according to the procedures of Method 9 is not required. However, it is necessary that the observer is knowledgeable with respect to the general procedures for determining the presence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training is to be obtained from written materials found in References 1 and 2 or from the lecture portion of the Method 9 certification course.

3.0 Definitions

3.1 *Emission frequency* means the percentage of time that emissions are visible during the observation period.

3.2 *Emission time* means the accumulated amount of time that emissions are visible during the observation period.

3.3 *Fugitive emissions* means emissions generated by a regulated source which is not collected by a capture system and is released to the atmosphere. This includes emissions that (1) escape capture by process equipment exhaust hoods; (2) are emitted during material transfer; (3) are emitted from buildings housing material processing or handling equipment; or (4) are emitted directly from process equipment.

3.4 *Observation period* means the accumulated time period during which observations are conducted, not to be less than the period specified in the applicable regulation.

3.5 *Smoke emissions* means a pollutant generated by combustion in a flare and occurring immediately downstream of the flame. Smoke occurring within the flame, but not downstream of the flame, is not considered a smoke emission.

4.0 Interferences

4.1 Occasionally, fugitive emissions from sources other than the source (e.g., road dust) may prevent a clear view of the source. This may particularly be a problem during periods of high wind. If the view of the potential emission points is obscured to such a degree that the observer questions the validity of continuing observations, then the observations shall be terminated, and the observer shall clearly note this fact on the data form.

5.0 Safety

5.1 Disclaimer. This method may involve hazardous materials, operations, and equipment. This test method may not address all of the safety problems associated with its use. It is the responsibility of the user of this test method to establish appropriate safety and health practices and determine the applicability of regulatory limitations prior to performing this test method.

6.0 Equipment

6.1 Stopwatches (two). Accumulative type with unit divisions of at least 0.5 seconds.

6.2 Light Meter. Light meter capable of measuring illuminance in the 50 to 200 lux range, required for indoor observations only.

11.0 Analytical Procedure

11.1 Selection of Observation Location. Survey the source or the building or structure housing the process to be observed, and determine the locations of potential emissions. If the source is located inside a building, determine an observation location that is consistent with the requirements of the applicable regulation (i.e., outside observation of emissions escaping the building/structure or inside observation of emissions directly emitted from the process unit). Select a position that enables a clear view of the potential emission point(s) of the source or of the building or structure housing the source. A position at least 4.6 m (15 feet), but not more than 400 m (0.25 miles), from the emission source is recommended. For outdoor locations, select a position where the sunlight is not shining directly in the observer's eyes.

11.2 Field Records.

11.2.1 Outdoor Location. Record the following information on the field data sheet (Figure 22-1): Company name, industry, process unit, observer's name, observer's affiliation, and date. Record also the estimated wind speed, wind direction, and sky condition. Sketch the process unit being observed, and note the observer location relative to the source and the sun. Indicate the potential and actual emission points on the sketch.

11.2.2 Indoor Location. Record the following information on the field data sheet (Figure 22-2): Company name, industry, process unit, observer's name, observer's affiliation, and date. Record as appropriate the type, location, and intensity of lighting on the data sheet. Sketch the process unit being observed, and note the observer location relative to the source. Indicate the potential and actual fugitive emission points on the sketch.

11.3 Indoor Lighting Requirements. For indoor locations, use a light meter to measure the level of illumination at a location as close to the emission source(s) as is feasible. An illumination of greater than 100 lux (10 foot candles) is considered necessary for proper application of this method.

11.4 Observations.

11.4.1 Procedure. Record the clock time when observations begin. Use one stopwatch to monitor the duration of the observation period. Start this stopwatch when the observation period begins. If the observation period is divided into two or more segments by process shutdowns or observer rest breaks (see Section 11.4.3), stop the stopwatch when a break begins and restart the stopwatch without resetting it when the break ends. Stop the stopwatch at the end of the observation period. The accumulated time indicated by this stopwatch is the duration of observation period. When the observation period is completed, record the clock time. During the observation period, continuously watch the emission source. Upon observing an emission (condensed water vapor is not considered an emission), start the second accumulative stopwatch; stop the watch when the emission stops. Continue this procedure for the entire observation period. The accumulated elapsed time on this stopwatch is the total time emissions were visible during the observation period (i.e., the emission time.)

11.4.2 Observation Period. Choose an observation period of sufficient length to meet the requirements for determining compliance with the emission standard. It may not be necessary to observe the source for this entire period if the emission

time required to indicate noncompliance (based on the specified observation period) is observed in a shorter time period. In other words, if the regulation prohibits emissions for more than six minutes in any hour, then observations may (optional) be stopped after an emission time of six minutes is exceeded. Similarly, when the regulation is expressed as an emission frequency and the regulation prohibits emissions for greater than 10% of the time in any hour, then observations may (optional) be terminated after six minutes of emission are observed since six minutes is 10% of an hour. In any case, the observation period shall not be less than six minutes in duration. In some cases, the process operation may be intermittent or cyclic. In such cases, it may be convenient for the observation period to coincide with the length of the process cycle.

11.4.3 Observer Rest Breaks. Do not observe emissions continuously for a period of more than 15 to 20 minutes without taking a rest break. For sources requiring observation periods of greater than 20 minutes, the observer shall take a break of not less than five minutes and not more than 10 minutes after every 15 to 20 minutes of observation. If continuous observations are desired for extended time periods, two observers can alternate between making observations and taking breaks.

11.5 Recording Observations. Record the accumulated time of the observation period on the data sheet as the observation period duration. Record the accumulated time that emissions were observed on the data sheet as the emission time. Record the clock time that the observation period began and ended, as well as the clock time any observer breaks began and ended.

12.0 Data Analysis and Calculations

To determine the emission rate expressed as an emission frequency (in percent), divide the accumulated emission time (in seconds) by the duration of the observation period (in seconds) or by any minimum observation period, if the actual observation period is less than the required period, and multiply this quotient by 100.

Operating Requirements

3.5 Operating Procedures

The sand and gravel transfers, crushers, screens, and associated processes shall be operated according to the respective operation and maintenance (O&M) manual and manufacturer's specifications during the operation.

3.6 Sand and Gravel Mining/Processing

- The material processed shall not exceed 13,200 tons per calendar day.
- In accordance with the State Implementation Plan, 40 CFR 52.670(d), EPA-approved state source-specific requirements, the material processed shall not exceed 600,000 tons per any consecutive 12-calendar month period.

3.7 Reasonable Control of Fugitive Emissions

As required in IDAPA 58.01.01.651, all reasonable precautions shall be taken to prevent PM from becoming airborne. In determining what is reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM.

Some of the reasonable precautions include, but are not limited to, the following:

- Using water or chemicals for controlling dust when demolishing existing buildings or structures, performing construction operations, grading roads, and clearing of lands.
- Applying asphalt, water or suitable chemicals to, or covering, dirt roads, material stockpiles, and other surfaces that can create dust.
- Installing and using hoods, fans and fabric filters, or equivalent systems to enclose and vent the dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering open bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and maintaining them in a clean condition.
- Promptly removing earth or other stored material from streets.

3.8 Fugitive Dust Best Management Practice

Clements Concrete Company shall use Best Management Practices (BMP) as defined by IDAPA 58.01.01.011.01 to control the emissions of fugitive dust. Clements Concrete Company shall control the fugitive emissions at each site of operations for the duration of operations at each site.

3.8.1 Vehicle Track-out BMP

Triggers that require initiation of a strategy or strategies to control fugitive dust emissions from track-out onto paved public roadways include, but are not limited to:

- Visible deposition of mud, dirt, or similar debris on the surface of a paved public roadway.
- Visible fugitive emissions from vehicle traffic on a paved public roadway that approach 20% opacity for a period or periods aggregating more than one minute in any 60-minute period.
- Citizen complaints of failure to reasonably control fugitive dust shall be expeditiously evaluated by the permittee for merit. If the permittee determines the complaint has merit, the progressive strategy shall be expeditiously employed to reasonably control fugitive dust. DEQ may review records and investigate citizen complaints as appropriate. If DEQ finds that a complaint has merit, it may determine additional control measures are required.

Strategies to control fugitive dust emissions from track-out onto paved public roadways include, but are not limited to:

- Prompt removal of mud, dirt, or similar debris from the surface of the paved public roadway.
- Water flush, and/or water flush and vacuum sweep, the surface of the paved public roadway. Runoff shall be controlled so it does not saturate the surface of the adjacent unpaved haul road such that track-out is enhanced. If runoff is not, or cannot be controlled, gravel shall be applied to the surface of the adjacent unpaved haul road over an area sufficient to control track-out.
- Apply gravel to the surface of the adjacent unpaved haul road. The area of application shall be sufficient to control track-out.

- Apply an environmentally safe chemical soil stabilizer of chemical dust suppressant to the surface of the adjacent unpaved haul road. The area of application shall be sufficient to control track-out.

3.8.2 Unpaved Haul Roads BMP

Triggers that require initiation of a strategy or strategies to control fugitive dust emissions from unpaved haul roads include, but are not limited to:

- Visible fugitive emissions from vehicle traffic on an paved public roadway that approach 20% opacity for a period or periods aggregating more than one minute in any 60-minute period.
- Citizen complaints of failure to reasonably control fugitive dust shall be expeditiously evaluated by the permittee for merit. If the permittee determines the complaint has merit, the progressive strategy shall be expeditiously employed to reasonably control fugitive dust. DEQ may review records and investigate citizen complaints as appropriate. If DEQ finds that a complaint has merit, it may determine additional control measures are required.

Strategies to the control fugitive dust emissions from unpaved haul roads include, but are not limited to:

- Limit vehicle traffic on unpaved haul roads.
- Limit vehicle speeds on unpaved haul roads. If a speed limit is imposed, signs shall be posted along the haul route which clearly indicate the speed limit. Signs shall be placed so they are visible entering and leaving the site of operations.
- Apply water to the surface of the unpaved haul road. Runoff shall be controlled so it does not saturate the surface of the unpaved haul road such that it causes track-out. If runoff is not or cannot be controlled, gravel shall be applied to the surface of the unpaved haul road over an area sufficient to control track-out.
- Apply gravel to the surface of the unpaved haul road.
- Apply an environmentally safe chemical soil stabilizer or chemical dust suppressant to the surface of the unpaved haul road.
- Other controls strategy or strategies as approved by DEQ.

3.8.3 Transfer point, screening operations, and stacks and vents BMPs

Triggers that require initiation of a strategy or strategies to control fugitive dust emissions from transfer points, belt conveyors, bucket elevators, screening operations, conveying systems, and capture systems include but are not limited to:

- Opacity greater than 20% from any transfer point on a belt conveyor or conveying system.
- Citizen complaints of failure to reasonably control fugitive dust shall be expeditiously evaluated by the permittee for merit. If the permittee determines the complaint has merit, the progressive strategy shall be expeditiously employed to reasonably control fugitive dust. DEQ may review records and investigate citizen complaints as appropriate. If DEQ finds that a complaint has merit, it may determine additional control measures are required.

Strategies to control fugitive dust emissions for transfer points, belt conveyors, bucket elevators, screening operations, conveying systems, capture systems, and building vents include but are not limited to:

- Limit drop heights of materials such that a homogeneous flow of material is maintained.
- Install, operate, and maintain water supply bars to control fugitive dust emissions at transfer points on belt conveyors, conveyor systems, bucket elevators, and screening operations as necessary.
- Other control strategy or strategies as approved by DEQ.

Strategies for the control of fugitive emissions from any crusher, grinding mill, or building vent that shall be applied on frequency such that visible fugitive emissions do not exceed any applicable opacity limit.

- Limit drop heights of materials such that a homogeneous flow of material is maintained.
- Install, operate, and maintain water supply bars to control fugitive dust emissions at crusher drop points as necessary.
- Other control strategy or strategies as approved by DEQ.

3.8.4 Stockpiles BMP

Triggers that require immediate initiation of a strategy or strategies to control fugitive dust emissions from stockpiles include but are not limited to:

- Visible fugitive emission from wind erosion of any stockpile that approaches 20% opacity for a period or periods aggregating more than one minute in any 60-minute period.
- Citizen complaints of failure to reasonably control fugitive dust shall be expeditiously evaluated by the permittee for merit. If the permittee determines the complaint has merit, the progressive strategy shall be expeditiously employed to reasonably control fugitive dust. DEQ may review records and investigate citizen complaints as appropriate. If DEQ finds that a complaint has merit, it may determine additional control measures are required.

Strategies for control of fugitive emission from stockpiles include but are not limited to:

- Limit the height of the stockpiles.
- Limit the disturbance of the stockpile.
- Apply water onto the surface of the stockpile.
- Other control strategy or strategies as approved by DEQ.

Monitoring and Recordkeeping Requirements

3.9 Monitoring Operation Parameters

The permittee shall monitor and record the following process data. The most recent five years' compilation of records shall be kept onsite, in a record, and shall be made available to DEQ representatives upon request.

- Each calendar day, the amount of material processed that day while the plant is operating.
- Each month, the amount of material processed of that month, and the material processed for the most recent 12-calendar month period, in accordance with the State Implementation Plan, 40 CFR 52.670(d), EPA-approved state source-specific requirements.

3.10 Monitor Visible Emissions

The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions, to comply with Permit Condition 2.4. If visible emissions are observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each monthly visible emission inspection. The most recent two years' records shall be kept onsite, and shall be made available to DEQ representatives upon request.

3.11 Operations and Maintenance (O&M) Manual Requirements

The permittee shall have developed an O&M manual describing the dust control procedures for the sand and gravel transfers, crushers, screens, vehicle traffic, and associated processes to comply with this permit, including General Provision 5.2. This manual shall remain onsite at all times and shall be made available to DEQ representatives upon request. A copy of the manual shall be submitted to DEQ's Boise Regional Office at the following address upon receiving this permit:

Air Quality Permit Compliance
Department of Environmental Quality, Boise Regional Office
1445 N. Orchard
Boise, ID 83706-2239

4 NSPS 40 CFR 60, Subpart OOO – Standards for Nonmetallic Mineral Processing Plants

This section incorporates applicable requirements from 40 CFR 60 Subpart OOO. Should there be a conflict between 40 CFR 60 and any of the permit conditions in this section, the 40 CFR 60 shall govern, including any applicable amendments to that regulation.

Equipment in Table 1.1 constructed, reconstructed, or modified after the effective date of August 31, 1983, is an *affected facility* subject to the requirements of this section. Any crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station as defined in 40 CFR 60.671 which has been constructed, reconstructed, or modified (as defined in 40 CFR 60) after August 31, 1983, is an *affected facility* subject to the requirements of this section, except as provided in 40 CFR 60.670.

Emission Limits

4.1 NSPS 40 CFR 60, Subpart OOO - Standards for PM

Affected facilities shall meet the fugitive emission limits and compliance requirements in Table 4.1 within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup as required under 40 CFR 60.11, in accordance with 40 CFR 60.672(b). The requirements in Table 4.1 apply for fugitive emissions from affected facilities without capture systems and for fugitive emissions escaping capture systems.

Table 4.1 Fugitive Emission Limits

For	The permittee shall meet the following fugitive emissions limit for grinding mills, screening operations, bucket elevators, transfer points on belt conveyors, bagging operations, storage bins, enclosed truck or railcar loading stations or from any other affected facility (as identified in Table 1.1)	The permittee shall meet the following fugitive emissions limit for crushers at which a capture system is not used	The permittee shall demonstrate compliance with these limits by conducting
Affected facilities (as identified in Table 1.1) that commenced construction, modification, or reconstruction after August 31, 1983 but before April 22, 2008.	10 percent opacity	15 percent opacity	An initial performance test according to 40 CFR 60.11 and 40 CFR 60.675 (Permit Conditions 4.3 and 4.8).
Affected facilities (e.g., two 2016 Good Fellow conveyors as identified in Table 1.1) that commence construction, modification, or reconstruction on or after April 22, 2008.	7 percent opacity	12 percent opacity	An initial performance test according to 40 CFR 60.11 and 40 CFR 60.675 (Permit Conditions 4.3 and 4.8); and Periodic inspections of water sprays according to 40 CFR 60.674(b) and 40 CFR 60.676(b) (Permit Conditions 4.2 and 4.6); and
			A repeat performance test according to 40 CFR 60.11 and 40 CFR 60.675 within 5 years from the previous performance test for fugitive emissions from affected facilities without water sprays. Affected facilities controlled by water carryover from upstream water sprays that are inspected according to the requirements in 40 CFR 60.674(b) and 40 CFR 60.676(b) (Permit Conditions 4.2 and 4.6) are exempt from this 5-year repeat testing requirement.

Monitoring

4.2 NSPS 40 CFR 60, Subpart OOO - Monitoring

For affected facilities for which construction, modification, or reconstruction commenced on or after April 22, 2008 (e.g., two 2016 Good Fellow conveyors), the permittee shall perform monthly periodic inspections to check that water is flowing to discharge spray nozzles in the wet suppression system, in accordance with 40 CFR 60.674(b). The permittee shall initiate corrective action within 24 hours and complete corrective action as expediently as practical if the permittee finds that water is not flowing properly during an inspection of the water spray nozzles. The permittee shall record each inspection of the water spray nozzles, including the date of each inspection and any corrective actions taken, in the logbook required under 40 CFR 60.676(b).

- If an affected facility that routinely uses wet suppression water sprays ceases operation of the water sprays or is using a control mechanism to reduce fugitive emissions other than water sprays during the monthly inspection (for example, water from recent rainfall), the required logbook entry shall specify the control mechanism being used instead of the water sprays.

Testing

4.3 NSPS 40 CFR 60, Subpart OOO - Test Methods and Procedures

In conducting the performance tests required in 40 CFR 60.8, the permittee shall use as reference methods and procedures the test methods in Appendices A-1 through A-7 of 40 CFR 60 or other methods and procedures as specified in 40 CFR 60, Subpart OOO, except as provided in 40 CFR 60.8(b), in accordance with 40 CFR 60.675.

- In determining compliance with the particulate matter standards in 40 CFR 60.672(b) or 40 CFR 60.672(e)(1), the permittee shall use Method 9 of Appendix A-4 to 40 CFR 60 and the procedures in 40 CFR 60.11, with the following additions:
  - The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet).
  - The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (e.g., road dust). The required observer position relative to the sun (Method 9 of Appendix A-4 to 40 CFR 60, Section 2.1) must be followed.
  - For affected facilities using wet dust suppression for particulate matter control, a visible mist is sometimes generated by the spray. The water mist must not be confused with particulate matter emissions and is not to be considered a visible emission. When a water mist of this nature is present, the observation of emissions is to be made at a point in the plume where the mist is no longer visible.
- When determining compliance with the fugitive emissions standard for any affected facility described under 40 CFR 60.672(b) or 40 CFR 60.672(e)(1), the duration of the Method 9 (40 CFR 60, Appendix A-4) observations must be 30 minutes (five 6-minute averages). Compliance with the applicable fugitive emission limits (Table 4.1) must be based on the average of the five 6-minute averages.
- For performance tests involving only Method 9 (40 CFR 60 Appendix A-4) testing, the permittee may reduce the 30-day advance notification of performance test in 40 CFR 60.7(a)(6) and 60.8(d) to a 7-day advance notification.

Recordkeeping and Reporting

4.4 NSPS 40 CFR 60, Subpart OOO - Performance Test Recordkeeping and Reporting

The permittee shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in 40 CFR 60.672, including reports of opacity observations made using Method 9 (40 CFR 60, Appendix A-4) to demonstrate compliance with 40 CFR 60.672(b), (e) and (f), in accordance with 40 CFR 60.676(f).

4.5 NSPS 40 CFR 60, Subpart OOO – Replacement or Reconstruction Recordkeeping and Reporting

Each permittee seeking to comply with 40 CFR 60.670(d) shall submit to DEQ the following information about the existing affected facility being replaced and the replacement piece of equipment, in accordance with 40 CFR 60.676(a).

- For a crusher, grinding mill, bucket elevator, bagging operation, or enclosed truck or railcar loading station:
  - The rated capacity in megagrams or tons per hour of the existing facility being replaced, and
  - The rated capacity in tons per hour of the replacement equipment.
- For a screening operation:
  - The total surface area of the top screen of the existing screening operation being replaced, and
  - The total surface area of the top screen of the replacement screening operation.
- For a conveyor belt:
  - The width of the existing belt being replaced, and
  - The width of the replacement conveyor belt.
- For a storage bin:
  - The rated capacity in megagrams or tons of the existing storage bin being replaced, and
  - The rated capacity in megagrams or tons of replacement storage bins.

4.6 NSPS 40 CFR 60, Subpart OOO – Recordkeeping and Reporting

- For affected facilities for which construction, modification, or reconstruction commenced on or after April 22, 2008 (e.g., two 2016 Good Fellow conveyors), the permittee shall record each periodic inspection required under 40 CFR 60.674(b) or (c), including dates and any corrective actions taken, in a logbook (in written or electronic format), in accordance with 40 CFR 60.676(b). The permittee shall keep the logbook onsite and make hard or electronic copies (whichever is requested) of the logbook available to DEQ and EPA upon request.
- The requirement under 40 CFR 60.7(a)(1) for notification of the date construction or reconstruction commenced is waived for affected facilities under 40 CFR 60, Subpart OOO.
- A notification of the actual date of initial startup of each affected facility shall be submitted to DEQ, in accordance with 40 CFR 60.676(i) and the General Provisions of this permit.
  - For a combination of affected facilities in a production line that begin actual initial startup on the same day, a single notification of startup may be submitted by the permittee to DEQ. The notification shall be postmarked within 15 days after such date

and shall include a description of each affected facility, equipment manufacturer, and serial number of the equipment, if available.

4.7 NSPS 40 CFR 60, Subpart OOO - Wet Material Processing Operation Recordkeeping and Reporting

The permittee of any wet material processing operation that processes saturated and subsequently processes unsaturated materials, shall submit a report of this change within 30 days following such change, in accordance with 40 CFR 60.676(g). At the time of such change, this screening operation, bucket elevator, or belt conveyor becomes subject to the applicable opacity limit in 40 CFR 60.672(b) and the emission test requirements of 40 CFR 60.11.

General Provisions

4.8 NSPS 40 CFR 60, Subpart A - General Provisions

The permittee shall comply with the applicable requirements of 40 CFR 60, Subpart A "General Provisions" in accordance with 40 CFR 60.1. A summary of requirements for affected facilities is provided in Table 4.2.

Table 4.2 NSPS 40 CFR 60, Subpart A - Summary of General Provisions

Section	Subject	Summary of Section Requirements
60.4	Address	• DEQ is delegated these Subparts and all requests, reports, applications, submittals, and other communications associated with 40 CFR 60, Subpart OOO and Subpart A shall be submitted to: Department of Environmental Quality Boise Regional Office 1445 N. Orchard Boise, ID 83706
60.7(a), (b), and (f)	Notification and Recordkeeping	• *Except as provided in Permit Condition 4.6*, notification shall be furnished of commencement of construction and reconstruction postmarked no later than 30 days of such date. • Notification shall be furnished of initial startup postmarked within 15 days of such date. • Notification shall be furnished of any physical or operational change that may increase emissions postmarked 60 days before the change is made. • Records shall be maintained of the occurrence and duration of any startup, shutdown or malfunction; any malfunction of the air pollution control equipment; or any periods during which a CMS or monitoring device is inoperative. • Records shall be maintained, in a permanent form suitable for inspection, of all measurements, performance testing measurements, calibration checks, adjustments and maintenance performed, and other required information. Records shall be maintained for a period of two years following the date of such measurements, maintenance, reports, and records.
60.8	Performance Tests	• *Except as provided in 40 CFR 60.675(g)*, at least 30 days prior notice of any performance test shall be provided to afford the opportunity to have an observer to be present. • Within 60 days of achieving the maximum production rate, but not later 180 days after initial startup, performance test(s) shall be conducted and a written report of the results of such test(s) furnished. • Performance testing facilities shall be provided as follows: Sampling ports adequate for test methods applicable to such facility. Safe sampling platform(s). Safe access to sampling platform(s). Utilities for sampling and testing equipment. • Performance tests shall be conducted and data reduced in accordance with 40 CFR 60.8(b), (c), and (f)

Table 4.2 NSPS 40 CFR 60, Subpart A - Summary of General Provisions

Section	Subject	Summary of Section Requirements
60.11(a), (d), (f), and (g)	Compliance with Standards and Maintenance Requirements	• When performance tests are required, compliance with standards is determined by methods and procedures established by 40 CFR 60.8 *and as provided in 40 CFR 60, Subpart OOO.* • At all times, including periods of startup, shutdown, and malfunction, the owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. • For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.
60.11(b), (c), and (e)	Compliance with Standards and Maintenance Requirements (Opacity)	• *Except as provided in 40 CFR 60.675(c)*, compliance with opacity standards shall be determined by Method 9 in Appendix A of 40 CFR 60. The permittee may elect to use COM measurements in lieu of Method 9, provided notification is made at least 30 days before the performance test. • The opacity standards shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided. • Opacity observations shall be conducted concurrently with the initial performance test required in 40 CFR 60.8 in accordance with the requirements and exceptions in 40 CFR 60.11(e).
60.12	Circumvention	• No permittee shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.
60.13	Monitoring Requirements (CMS)	• All CMS and monitoring devices shall be installed and operational prior to conducting performance tests required by 40 CFR 60.8. • A performance evaluation of the COMS or CEMS shall be conducted before or during any performance test and a written report of the results of the performance evaluation furnished. Reporting requirements include submitting performance evaluations reports within 60 days of the evaluations required by this section, and submitting results of the performance evaluations for the COM within 10 days before a performance test, if using a COM to determine compliance with opacity during a performance test instead of Method 9. • The zero and span calibration drifts must be checked at least once daily and adjusted in accordance with the requirements in 40 CFR 60.13(d). • The zero and upscale (span) calibration drifts of a COMS must be automatically, intrinsic to the opacity monitor, checked at least once daily. • Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all CMS shall be in continuous operation and shall meet minimum frequency of operation requirements as specified in 40 CFR 60.13(e). • All CMS or monitoring devices shall be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. CMS shall be located and installed in accordance with the requirements in 40 CFR 60.13(f) and (g). • Data shall be reduced and computed in accordance with the procedures in 40 CFR 60.13(h), (i), and (j).
60.14	Modification	• A physical or operational change which results in an increase in the emission rate to the atmosphere or any pollutant to which a standard applies shall be considered a modification, and upon modification an existing facility shall become an affected facility in accordance with the requirements and exemptions in 40 CFR 60.14. • Within 180 days of the completion of any physical or operational change, compliance with all applicable standards must be achieved.
60.15	Reconstruction	• An existing facility, upon reconstruction, becomes an affected facility, irrespective of any change in emission rate in accordance with the requirements of 40 CFR 60.15.

5 General Provisions

General Compliance

5.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the "Rules for the Control of Air Pollution in Idaho." The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the "Rules for the Control of Air Pollution in Idaho," and the Environmental Protection and Health Act (Idaho Code §39-101, et seq.)

[Idaho Code §39-101, et seq.]

5.2 The permittee shall at all times (except as provided in the "Rules for the Control of Air Pollution in Idaho") maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

5.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

5.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee's premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

5.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

5.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more; and

- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/94]

- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

5.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

5.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

5.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

Monitoring and Recordkeeping

5.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

5.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

5.12 All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

5.13 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

5.14 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

5.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

5.16 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]